

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

WACO DIVISION

MIDAS GREEN TECHNOLOGIES, LLC,  
- VS. -

RHODIUM ENTERPRISE, INC.; RHODIUM TECHNOLOGIES  
LLC; RHODIUM 10MW LLC; RHODIUM 2.0 LLC; RHODIUM  
30MW LLC; RHODIUM ENCORE LLC; RHODIUM  
INDUSTRIES LLC; RHODIUM JV LLC; RHODIUM  
RENEWABLES LLC; RHODIUM SHARED SERVICES LLC;  
RHODIUM SHARED SERVICES PR INC.; CHASE  
BLACKMON; CAMERON BLACKMON; AND NATHAN  
NICHOLS,

Case No.: 6:22-cv-00050

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Gianni Cutri, applicant herein, and  
moves this Court to grant admission to the United States District Court for the Western District of  
Texas pro hac vice to represent Rhodium Enterprise, Inc. et al. in this case, and  
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)  
Kirkland & Ellis LLP with offices at:  
Mailing address: 300 North La Salle  
City, State, Zip Code: Chicago, IL 60654  
Telephone: (312) 862-2000 Facsimile: (312) 862-2200
2. Since 11/9/2000, Applicant has been and presently is a  
member of and in good standing with the Bar of the State of Illinois.  
Applicant's bar license number is 6272109.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>Illinois State Court</u>	<u>11/9/2000</u>
<u>US Court of Federal Claims</u>	<u>8/1/2001</u>
<u>See Attached Additional Courts</u>	<u></u>

3.

## Additional Court Admissions

<b>Court</b>	<b>Admission Date</b>	<b>Active or Inactive</b>
US District Court, NDIL	April 29, 2003	Active
US District Court, EDTX	March 2, 2011	Active
US Court of Appeals, Federal	November 16, 2011	Active
US Court of Appeals, Seventh Circuit	February 10, 2012	Active
US District Court, NDIL, Trial Bar	July 12, 2013	Active
US District Court, CDIL	January 15, 2019	Active

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. I ☒ have ☐ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: 13-cv-0116 on the 24 day of January, 2017.

Number: 05-cv-0008 on the 28 day of February, 2005.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

N/A

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Kat Li  
Mailing address: 401 Congress Avenue  
City, State, Zip Code: Austin, TX 78701  
Telephone: 512-678-9100

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Gianni Cutri to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Gianni Cutri

[printed name of Applicant]

  
[signature of Applicant]

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 21st day of March, 2022.

Gianni Cutri

[printed name of Applicant]

  
[signature of Applicant]

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**

**Please Choose Division**

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**ORDER**

BE IT REMEMBERED on this day, there was presented to the Court the Motion for

Admission Pro Hac Vice filed by Gianni Cutri, counsel for  
Rhodium Enterprise, Inc. et al.

\_\_\_\_\_, and the Court, having reviewed the motion, enters  
the following order:

IT IS ORDERED that the Motion for Admission Pro Hac Vice is GRANTED, and

Gianni Cutri may appear on behalf of Rhodium Enterprise, Inc. et al.

in the above case.

IT IS FURTHER ORDERED that Gianni Cutri, if he/she  
has not already done so, shall immediately tender the amount of \$100.00, made payable to: **Clerk, U.S.  
District Court**, in compliance with Local Court Rule AT-l(f)(2).

SIGNED this the \_\_\_\_\_ day of March, 20 22.

\_\_\_\_\_  
Please Choose Judge